

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: ) Chapter 7  
          ) Case No. 15-42289  
William Davis, ) Hon. Deborah L. Thorne  
          ) Hearing Date: November 29, 2016  
Debtor.    ) Hearing Time: 9:30 a.m.

**Notice of Routine Motion**

TO: See Attached Service List

On Tuesday, November 29, 2016, at 9:30 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Deborah L. Thorne, or any judge sitting in her stead, in the courtroom usually occupied by her in Room 613 of the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and shall then and there present the Trustee's Final Motion For Extension Of Time To File Complaint For Objection To Discharge.

/s/ Joseph A. Baldi

**Certificate of Service**

I, Joseph A. Baldi, an attorney, certify that I caused a true and correct copy of the foregoing Notice and the document identified therein to be served on the persons on the attached service, either electronically or via first class mail, postage prepaid, on November 22, 2016.

/s/ Joseph A. Baldi

Joseph A. Baldi  
Julia D. Loper  
Baldi Berg, Ltd.  
20 N. Clark Street, Suite 200  
Chicago, Illinois 60602  
(312) 726-8150

**SERVICE LIST**  
*In re William Davis*  
*Case No. 15-42289*

**Via Electronic Notice**

Office of the U.S. Trustee  
[USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)

Karen J. Porter  
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**Via First Class Mail**

William A. Davis  
4415 Oakenwald Avenue  
Chicago, IL 60653

Sara E. Lorber  
Law Offices of William J. Factor  
105 W. Madison Street, Ste. 1500  
Chicago, IL 60602

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**Trustee's Final Motion  
For Extension Of Time To File Complaint For Objection To Discharge**

Joseph A. Baldi, not individually but solely as trustee ("Trustee") of the estate of William Davis, pursuant to Rule 4004 of the Federal Rules of Bankruptcy Procedure ("Rules") and Rule 9013-9 of the Local Bankruptcy Rules requests this Court for the entry of an order extending the time to file a complaint objecting to discharge in this case.

In support of his motion, Trustee respectfully states as follows:

1. This case was commenced on December 15, 2015, by the filing of a voluntary petition for relief under Chapter 7 of the Code.
2. Joseph A. Baldi is the duly appointed, qualified and acting trustee in this case.
3. The date this Court initially set for the filing of objections to discharge was March 25, 2016. On March 30, 2016, an Order Granting Trustee's Motion to Extend Time to File Objections to Discharge was entered extending the time to May 30, 2016. Thereafter, Trustee received a second extension of time to file an objection to and including September 27, 2016 and a third extension of time to file an objection to and including November 28, 2016.
4. The prior extensions were necessary because Trustee was waiting to receive documents from the Debtor. Additionally, the Carpenter's Union recently conducted its deposition of the Debtor.

5. Trustee has been in negotiations with the Debtor and his counsel to settle the estate's claims against the Debtor. The Trustee has made an offer to the Debtor to settle the estate's claims to which the Debtor has not yet responded. Since negotiations began, the Debtor recently obtained new counsel who has requested a new settlement offer from the Trustee. The Trustee and Debtor's new counsel, Sara Lorber, have mutually agreed to one final extension of time to object to discharge in order to give Ms. Lorber time to review and analyze the Trustee's Settlement Offer.

6. Trustee believes extending the time will allow the parties to determine if negotiations are successful and believes that an additional 60 days are necessary.

7. This motion has been filed within the time period set by prior order of court for filing complaints objecting to the discharge of Debtor.

WHEREFORE, Joseph A. Baldi, Trustee of the estate of William Davis, requests, pursuant to Rule 4004(b) of the Federal Rules of Bankruptcy Procedure, that the Court grant an extension of 60 days to and including January 27, 2017, within which complaints objecting to the discharge of the Debtor may be filed.

Dated: November 22, 2016

Respectfully submitted,

Joseph A. Baldi, Trustee of the  
Estate of William Davis, debtor

By: /s/ Joseph A. Baldi  
One of His Attorneys

Joseph A. Baldi  
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